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October 18, 2024

By ECF

Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Sarah Goolden v. Hamed Wardak***
1:19 Civ. 6257 (ALC/VF)

Dear Judge Figueredo:

We represent the defendant Hamed Wardak (“Defendant”) in the above-referenced action. We jointly submit this status report with counsel for plaintiff/counterclaim-defendant Sarah Goolden (“Plaintiff”) to provide the Court with a status update in response to the Court’s Order of October 9, 2024 (Dkt. No. 213).

Since the last joint status report the parties submitted to Honorable Andrew L. Carter, Jr., on August 30, 2024 (Dkt. No. 212), the parties have continued correspondence regarding (1) the attorney’s fees and costs that the Court ordered Plaintiff to reimburse Defendant in the Court’s Order of May 8, 2024 (the “Order”); and (2) scheduling the second deposition of Defendant. Regarding (1) attorney’s fees and costs, the parties have reached an impasse, and Defendant is submitting a pre-motion conference letter request regarding that issue. Regarding (2), the Defendant’s deposition has not been scheduled. Plaintiff has sought to schedule the deposition and proposed dates to do so. Defendant has not been available on those dates and takes the position that the Court-ordered attorney’s fees and costs should be paid before the new deposition is scheduled. Plaintiff does not consent to such a stay and wishes to conduct the new deposition irrespective of the attorney’s fee dispute.

We thank the Court for its consideration.

Respectfully submitted,
YANKWITT LLP

By: 
Benjamin Allee

cc: All counsel of record (via ECF)